

**UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	Case No.: 23-05433
)	
Daniel Olswang,)	Chapter 7 (Lake County)
)	
Debtor(s).)	Hon. A. Benjamin Goldgar
)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on August 25, 2023, at 11:00 a.m., or as soon thereafter as counsel may be heard, I will appear before the Honorable A. Benjamin Goldgar, or any judge sitting in that judge's place, **either** in courtroom 642 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, and present the **Trustee's Motion to Extend Time to Object to Discharge**, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 160 817 7512, and the passcode is 623389. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

Dated: July 31, 2023

Respectfully submitted,

Reed Heiligman (No. 6294312)
HILTZ ZANZIG & HEILIGMAN LLC
53 West Jackson Blvd., Suite 1301
Chicago, Illinois 60604
Telephone: 312.566.9008
reed@hzhlaw.com

**REED HEILIGMAN, NOT INDIVIDUALLY
BUT AS CHAPTER 7 TRUSTEE**

By: /s/ Reed Heiligman
(Attorney)

CERTIFICATE OF SERVICE

I, Reed Heiligman, an attorney, hereby certify that, on July 31, 2023, I caused a true and correct copy of the foregoing **Notice of Motion** and **Trustee's Motion to Extend Time to Object to Discharge** to be served on the following via the indicated means:

VIA CM/ECF:

- **Adam G. Brief** Adam.Brief@usdoj.gov
- **Joseph E Cohen** jcohen@cohenandkrol.com,
jcohen@ecf.AxosFS.com;jcohenattorney@gmail.com;jneiman@cohenandkrol.com;acartwright@cohenandkrol.com
- **Michelle Golden** mgolden@pagesandprice.com
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- **Reed Heiligman** reed@hzhlaw.com,
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- **Gregory J Jordan** gjordan@jz-llc.com
- **Patrick S Layng** USTPRegion11.ES.ECF@usdoj.gov

VIA US MAIL:

Daniel Olswang
995 Half Day Road
Highland Park, IL 60035

/s/ Reed Heiligman

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IN RE:)	Case No.: 23-05433
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TRUSTEE’S MOTION TO EXTEND TIME TO OBJECT TO DISCHARGE

Reed Heiligman, not individually but as chapter 7 trustee (the “Trustee”) of the bankruptcy estate of Daniel Olswang (the “Debtor”), by his attorneys Hiltz Zanzig & Heiligman LLC, respectfully requests entry of an order, pursuant to 11 U.S.C. § 727(c)(1) and Bankruptcy Rule 4004(b), extending the time by which he may object to the Debtor’s discharge. In support of this motion, the Trustee states as follows:

JURISDICTION

1. The Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409. Consideration of this motion is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (J).

2. The statutory basis for the relief sought in this motion is 11 U.S.C. § 727(c)(1) and Bankruptcy Rule 4004(b).

RELIEF REQUESTED

3. On April 25, 2023, (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 7 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), in the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division.

4. Joseph E. Cohen was appointed chapter 7 trustee of the Debtor's bankruptcy estate.

5. On July 29, 2023, Mr. Cohen resigned as chapter 7 trustee [Dkt. No. 29] and on July 31, 2023 Ilene F. Goldstein was appointed successor trustee. On July 31, 2023, Ms. Goldstein resigned as successor trustee [Dkt. No. 30], and the Reed Heiligman was subsequently appointed as successor trustee.

6. The deadline to object to the Debtor's discharge is presently August 1, 2023. Because the Trustee was only recently appointed as successor trustee, the Trustee requests additional time to investigate whether there may be a basis to object to the Debtor's discharge pursuant to 11 U.S.C. § 727(a) and requests an extension of time to do so through November 1, 2023.

NOTICE

7. The Trustee has provided notice of this motion to the United States Trustee, the chapter 7 trustee, counsel for the Debtor and the Debtor. In light of the notice provided, and that this motion is one that will ordinarily be granted without hearing in the absence of objection pursuant to Local Rule 9013-9(b)(1), the Trustee submits that no further notice is necessary.

WHEREFORE, Reed Heiligman, not individually, but as chapter 7 trustee of Daniel Olswang, respectfully requests that the Court enter an order, pursuant to 11 U.S.C. § 727(c)(1) and Bankruptcy Rule 4004(b), extending the deadline to object to the Debtor's discharge to November 1, 2023, and granting further relief as this Court deems just.

Dated: July 31, 2023

Respectfully submitted,

**REED HEILIGMAN, NOT INDIVIDUALLY
BUT AS CHAPTER 7 TRUSTEE**

By: /s/ Reed Heiligman

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